

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN**

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BROAN-NUTONE LLC,	)	
	)	
Plaintiff	)	
	)	
v.	)	Civil Action No. 2:11-cv-00393-JPS
	)	
CONGLOM HONG KONG LIMITED	)	
	)	
Defendant.	)	
	)	

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**CONGLOM HONG KONG LIMITED’S MOTION TO DISMISS UNDER FRCP 12(b)(6)  
AND 12(b)(2)**

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Defendant, Conglom Hong Kong Limited (“Conglom HK”), hereby moves, pursuant to Rule 12(b)(6) and Rule 12(b)(2) of the Federal Rules of Civil Procedure, to dismiss the claims against it in the Complaint of Plaintiff, Broan-NuTone LLC’s (Broan), for patent infringement (“Complaint”) for failure to state a claim upon which relief can be granted and for lack of personal jurisdiction. As permitted by Rule 12(b), Conglom HK files this motion in lieu of an answer and without waiving its right to answer to the allegations in Plaintiff’s Complaint.

The grounds for this motion are set forth fully in the accompanying Memorandum in Support of Conglom Hong Kong Limited’s Motion to Dismiss Under FRCP 12(b)(6) and 12(b)(2).

Dated: February 12, 2024

By: /s/Brian D. O'Reilly

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